

*Law Office of***James C. Thomas III**

27 OCT '15 RCVD

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October 27, 2015**VIA FACSIMILE - (202) 219-3496**Paul Stoetzer
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N. W.
Washington, D.C. 20463

RE: Values Are Vital (COO552422)

Dear Mr. Stoetzer:

We wrote to you on August 21 in response to your letter dated July 20, 2015 regarding the inconsistency of Values Are Vital (the "Committee") making a contribution to Marco Rubio for President, a federal candidate committee (the "Rubio Committee") while the Committee is registered with you as an "independent-expenditure-only" committee. In that letter we informed you that we would attempt to "fix" this inconsistency by having the contribution to the Rubio Committee refunded.

We sent a certified letter to the Rubio Committee on August 21. We are not sure why it took so long, but the green card showing delivery was not received until Saturday, September 26. The letter was apparently signed for on September 23. We updated you on the status of this effort with a letter dated September 28. Four weeks later we have still not received any communication from the Rubio Committee.

When preparing the October 15 Quarterly Report, we noticed that the check #1032 to the Rubio Committee had still not cleared the bank. Therefore, we had the bank place a stop payment order on this check. We have also amended the July 15 Quarter Report to delete the contribution to the Rubio Committee and amended the October 15 Quarterly Report to show the adjusted beginning cash on hand. We have also sent a certified letter to the Rubio Committee informing them that the prior check was issued in error and they should not attempt to cash it because a stop payment order has been applied to this check.

This should restore the Committee to its "independent-expenditure-only" status. However, if you have some alternative solution for how the Committee should report what has occurred, please let us know.

Sincerely,


James C. Thomas III


cc: Ronald M. Firman, Treasurer

2015 OCT 27 PM 1:00 FAX

Via FAX

NOTATION: ON: 0000-1040

Federal Election Commission
ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS
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<input checked="" type="checkbox"/> Other (Specify): <i>Fax Rec'd in RAD Office</i>	Date of Receipt or Postmarked <i>10/27/15</i>
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